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In the Matter of:

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Amendment of Part 97 of the)
Commissions's Rules to Eliminate)
Certain One-Way Communications in) RM No. 8626
the Amateur Radio Service Medium)
and High Frequency Bands.)

To the Commission

COMMENTS OF THE QUARTER CENTURY WIRELESS ASSOCIATION

The Quarter Century Wireless Association (QCWA), composed of more than 10,000 members, each with a minimum of 25 years' licensed experience, arguably represents the most experienced group of licensed radio amateurs. At a recent meeting of its Board of Directors, the QCWA voted unanimously to oppose the petition of W5YI . This petition, RM-8626, proposes FCC Rules changes which, if implemented, would eliminate one-way transmission of code practice and information bulletins below 30 MHz.

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W5YI states that the basis for his petition is the alleged ongoing abuse of current Rules governing one-way transmissions in the amateur service, the interference they generate, and the alleged lack of need for this type of operations below 30 MHz. In our opinion, these allegations constitute an unwarranted condemnation of all bulletin and code practice activities below 30 MHz. The effect of such action, if taken, is aptly described using a currently popular phrase "throwing the baby out with the bath water".

Abuses of the current system

We admit that certain amateur stations abuse the existing Rules, primarily because they fail to listen on a frequency to determine whether it is clear, before transmitting, thereby generating interference to any station which may then be using that frequency. With the growing number of radio amateurs, the medium and high frequency amateur bands are becoming more crowded. Therefore, pre-emptive operation by any station, whether engaged in one-way or two-way transmission, can be and is a problem. Eliminating one-way transmissions below 30 MHz is certainly not the answer.

The requirement to determine that a frequency is not in use, before transmitting, is routinely abused by great numbers of stations, by calling CQ without first inquiring if the frequency is in use, and by stations which "tune up" on a frequency, often for long periods, without first listening, and without identification.

The Commission has recognized the need for the types of one-way transmissions which the petitioner proposes to eliminate, and has set forth, in Section 97.113(b) of the current Rules, certain criteria for such one-way transmissions, implying that they apply particularly to telegraphy practice and/or information bulletin transmissions. It is our experience that many self-styled information bulletin transmissions fail to meet these criteria.

The need for information bulletins in the amateur service.

Almost since the inception of amateur radio there has been a recognized need for stations that could promptly dispense timely information. The American Radio Relay League (ARRL), another non-profit organization of and for radio amateurs, long ago established a Club Station, W1AW, which has a prearranged schedule to disseminate, on a daily basis, bulletins containing FCC releases, general interest bulletins on topics of interest to radio amateurs, and code practice. Any radio amateur can become informed on current happenings in amateur radio through these bulletins, and it has become, in effect, the "New York Times" of ham radio.

Today more than ever, the service provided by W1AW has become a necessity rather than a convenience. For example, proposed Commission actions -- of which the current Petition is a good example -- may have a brief period of 30 to 45 days for receipt of comments. There is insufficient time for these notices to appear in print-media such as QST, or CQ, prior to the deadline; and not all or even a majority of amateurs subscribe to quicker-reaction newsletters such as W5YI's Report, or the ARRL Letter. Often an ARRL Bulletin is the only timely means of disseminating such information.

Time and again, over the years, W1AW has proved its value in time of national crisis or domestic emergency, when amateur radio provided the primary means of communication. W1AW provided the coordination and guidance necessary to conduct such operations in an orderly and efficient manner.

Every member, and we emphasize "every member", of QCWA has had occasion to use W1AW, and hopes to continue to do so.

Summary

The subject petition is commendable in that it focuses attention on abuse of the privileges now allowed in the Rules for one-way transmissions. However, in view of the fact that the proposed Rules changes would also curtail activities and services such as those provided by W1AW, the Quarter Century Wireless Association recommends rejection of the Petition.

Respectfully submitted,

The Quarter Century Wireless Association

A handwritten signature in cursive script, reading "John J. Keller, W4ZC, for".

By: Lewis McCoy, W1ICP, President

Date: May 3rd, 1995

cc: Raymond A. Kowalski, Esq.,
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